Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	**)**	
Telecommunications Relay Services and	**)**	
Speech-to-Speech Services for	**)**	**CC Docket No. 98-67**
Individuals with Hearing and Speech	**)**	
Disabilities	**)**	

PETITION FOR RECONSIDERATION
WORLDCOM, INC.

I. Summary

On April 22, 2002, the Commission released an Order approving immediate reimbursement of IP-Relay calls from the Interstate Telecommunications Relay Service (TRS) Fund at the existing PSTN-based TRS rate.[1] The Order also granted one year waivers to the existing speed of answer requirements; emergency call handling requirements, and voice carryover (VCO), speech-to-speech (STS) and other voice services requirements. WorldCom applauds the steps the Commission has taken to encourage rapid dissemination of this innovative service by waiving those minimum requirements that are not technically feasible for IP-Relay

[1] Provision of Improved Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Petition for Clarification of WorldCom, Inc., ("IP-Relay Order"), CC Docket No. 98-67, Released April 22, 2002.

providers to offer, and by allowing immediate reimbursement from the Interstate TRS Fund. WorldCom strongly endorses the Commission's belief that technology and the marketplace will drive the pace at which internet-based relay providers will resolve the technical problems IP-Relay has meeting some of the existing minimum requirements.[2] Because IP-Relay providers must compete for each and every call, they will have a strong economic incentive to incorporate the capabilities of technological improvements in the Internet as they become available.

WorldCom is therefore disappointed that the Commission set fixed, and very limited, time periods for the waivers identified above. Two of the one-year waivers, emergency call handling and voice service capabilities, pose particular concern because their solution depends on technical developments in both customer premise equipment (CPE) and the Internet itself which are outside the control of individual carriers. WorldCom is concerned that the need to petition the Commission every year, until third parties, who face no financial penalties for delay, improve voice quality on the Internet and make the Internet capable of linking geographic location information to Internet addresses, will create financial uncertainty for providers of IP-Relay and delay expansion of the service. WorldCom had requested that the Commission indefinitely waive these requirements, and had argued that market forces would compel IP-Relay providers to offer these capabilities as soon as they became technically feasible. WorldCom renews that request in this Petition. In the event the Commission does not approve indefinite waivers, WorldCom petitions the Commission to waive its emergency service and voice requirements for a minimum of five years.

[2] IP-Relay Order, &32.

II. The Internet May Never Develop The Capability Of Linking Customer Location With An Internet Addresses

The ability of traditional relay providers to comply with the Commission's requirement for relay centers to automatically pass automatic number identification (ANI) to the nearest public service access provider (PSAP) is dependent on their ability to purchase billing name and address (BNA) from the originating local exchange company (LEC). In turn, the ability of the LEC to transmit this information depends on the existence of the appropriate switching and signaling software and equipment. Transmission of customer billing information based on location has historically developed on the public switched telephone network (PSTN) to facilitate jurisdictional separations, jurisdictional-based payments among interconnecting carriers, and jurisdictional-based billing of end users. These developments in turn are related to the fact that the PSTN is a circuit-switched network, which uses originating and terminating locations to set up a continuous circuit throughout the call path.

The Internet has developed along very different lines. While transmission requires an originating and terminating address, these addresses are not based on physical or geographic location. Very often a user is dynamically assigned a different address for each Internet session, an address that does not contain geographic location information. End users are not billed according to the distance between these addresses because these addresses do not contain originating and terminating location information.

Moreover, and most important, there is no movement within Internet standards-setting bodies to develop protocols linking customer location with Internet addresses. The only possible related activity is the effort to translate telephone numbers into Internet addresses, known as ENUM. With ENUM, a consumer or a business registers their telephone number with NeuStar, who maps this number into an Internet address. However, this effort does not offer a basis for

relay providers to automatically transmit calling location information to a PSAP. First, having registered the number, the user may then add functionality to this number by directing all calls to be sent to their home, business, to a fax machine, or an email program. This functionality may be changed many times in one day. Thus, there is no fixed correspondence between an ENUM and a location, or a terminal device. A person making an ENUM-based "call" could be calling from work, but could receive all responses at home. Thus, a person making an E911 through IP-Relay could place the call from work, but would be registered as being made from home. Incorrect location information would automatically be transferred to the PSAP. Second, the parties developing ENUM have purposely declined to allow personal, subscriber information to be transmitted or made available in any data base look- up in order to protect consumer privacy. So even if an ENUM call could only be made from one location, relay providers would not have access to that location information, and would not be able to automatically transfer any location information to the PSAP. Third, ENUM is voluntary. A person or company may register its telephone number with NEUSTAR and an Internet address will be assigned. So, even if personal information were transmitted, and even if it were tied to a single location, this information would not be universally available to the relay provider. Clearly, the ENUM effort will not provide a basis of transferring location information for relay sessions that originate on the Internet.

The Commission cites one suggestion for IP-Relay callers to develop pre-determined emergency messages that presumably have originating location information which they can quickly send with a key stroke.[3] However, this solution would not permit IP-Relay providers to automatically transfer a call, along with accurate originating location information to the PSAP. The transfer of information is dependent on an action taken by the caller (which may not occur in

[3] IP-Relay Order,&30.

a life threatening emergency). In addition, the information may not be accurate. The message may be set to transmit home location information, but if a user takes their laptop to another location to make an IP-Relay call, the location information would be incorrect. Similar problems occur with registering an emergency profile with the relay provider.

The Commission recognizes "…that it would be unreasonable to require IP-Relay to provide (originating ANI) information that it does not possess."[4] But then the Commission only provides a mere, one year, waiver, stating that "…we expect WorldCom and other IP relay providers will have devised a method by which they can automatically transfer calls to emergency services providers, including location information."[5] The Commission fails to explain why it believes carriers will possess this capability within one year. It is true that because IP-Relay providers must compete for every call, they have a strong incentive to quickly develop new relay capabilities from generally available innovations in computer and Internet technologies. But developing new Internet capabilities is far beyond the control of any single relay provider.

WorldCom petitions the Commission to waive the requirement for IP-Relay providers to automatically transmit originating location information to PSAPs for five years, or until Internet transfer, or other relevant, protocols permit the inclusion of originating location information. WorldCom also petitions the Commission to modify its expectations, and allow itself the flexibility to approve petitions for waiver extensions after five years, if providing originating location information remains technically infeasible. WorldCom is not asking the Commission to lower the burden of proof below that required for other waiver petitions. Given that there is no

[4] Id., &30.

[5] Id., &30.

technical solution on the horizon, the Commission's attitude injects a large element of insecurity into the viability of IP-Relay, precisely at the time it should be laying the foundations for its rapid dissemination.

III. It Will Be Many Years Before Voice Quality Over The Internet Sufficiently Improves And Necessary CPE Is Sufficiently Disseminated To Justify Mandating The Provision Of VCO and STS

The Commission also granted a mere, one year, waiver from its requirement to offer VCO and STS.[6] While WorldCom stated that it is possible to offer these services so long as a customer has a microphone, a sound card, and internet telephony software, we also made clear that the quality of service of a voice call via ones computer over the Internet was so poor and dependent on the quality of the user's customer premise equipment (CPE) that it would be a mistake to mandate their provision.[7] We explained that if relay providers attempted to offer these voice capabilities over IP-Relay before the technical conditions for quality service were available, relay operators could be unable to accurately communicate conversations. We expressed concern that this could result in a degradation of relay service, widespread complaints, and a reduction of confidence in the nation's relay system.

The quality of service for traditional VCO and STS can be controlled by the service provider because they are interfacing with standardized and universally available CPE, (i.e. TTY terminals and telephone handsets). In the case of computer-originated voice over the Internet, it may be many years before the voice quality significantly improves and before the necessary CPE become widely adopted by the hearing and speech-disabled community. WorldCom petitions

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[6] Id., &32.

[7] WorldCom Comments, Provision of Improved Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Petition for Clarification of WorldCom, Inc, CC Docket No. 98-67, at 7; Ex Parte Presentation, CC Docket No. 98-67, February 28, 2002.

the Commission to waive the requirements for VCO and STS for five years or until sound cards, speakers, voice software and Internet transmission meets 90% of the voice quality of the existing circuit-switched voice network and until 50% of hearing and speech disabled consumers have purchased the necessary CPE.

IV. Conclusion

For the reasons discussed above, WorldCom urges the Commission to grant its petitions.

Respectfully submitted

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Statement of Verification

I have read the foregoing, and to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on May 22, 2002

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